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August 29, 2012

The Honorable Viktor V. Pohorelsky  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

*Re: Andrew A. Abrahams v. The City of New York, et al.*  
Case number 12 Civ. 2911

Your Honor:

I am writing in response to the August 22, 2012 request for an enlargement of time to file an answer made by the attorney for the defendant City of New York, Special Assistant Corporation Counsel Deborah L. Mbabazi.

As stated in that letter, I have consented to the request for an enlargement of time. I would oppose, however, the defendant's request that your Honor "direct plaintiff to provide the City with a § 160.50 release and signed medical release by a date certain." In this case the plaintiff claims that he was improperly strip searched on a public street in broad daylight when he was ostensibly detained in connection excessively tinted windows on the car he was driving. He was given two tickets and ultimately found guilty on both. Because there was a conviction, any Department of Motor Vehicle or New York City Police Department records would not be sealed pursuant to New York Criminal Procedure Law § 160.50. Moreover, the plaintiff did not seek medical attention and is not claiming that he suffered any physical injuries. Accordingly, the plaintiff respectfully submits that the releases requested by the defendant City are unnecessary and inappropriate and that he should not be compelled to provide the same.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/

Darius Wadia (DW 8679)